

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

2023 MAY -3 PM 4:18

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUSTIN ROBERT FOLEY,

Defendant.

CASE NO. *D.23 Rcd*

JUDGE *Watson*

INFORMATION

18 U.S.C. §§ 2251(a) and (e)

18 U.S.C. §§ 2252(a)(4)(B) and (b)(2)

FORFEITURE ALLEGATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE  
(Sexual Exploitation of a Minor)

1. From in or about June 2018 and continuing through in or about September 2022, the exact dates being unknown, in the Southern District of Ohio, the defendant, **JUSTIN ROBERT FOLEY**, did employ, use, persuade, induce, entice, and coerce a minor, specifically Jane Doe One, an approximately fifteen-year old girl, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing and attempting to produce any visual depiction of such conduct, to wit: one or more digital images and/or video files depicting lascivious exhibition of the genitals and pubic area of Jane Doe One; the production of such visual depictions using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, specifically the internet and cellular phones.

**In violation of 18 U.S.C. §§ 2251(a) & (e).**

**COUNT TWO**  
**(Possession of Child Pornography)**

2. On or about September 20, 2022, in the Southern District of Ohio, the defendant **JUSTIN ROBERT FOLEY**, did knowingly possess matter, that is, digital image and video files stored on a cellular phone and an external hard drive, which contained one or more visual depictions that had been transported using any means and facility of interstate and foreign commerce, the production of such visual depictions involving the use of a minor engaging in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such visual depictions being of such conduct.

**In violation of 18 U.S.C. § 2252(a)(4)(B) & (b)(2).**

**FORFEITURE ALLEGATION**

3. The allegations of Counts One and Two of this Information are hereby incorporated by reference as if fully rewritten herein for purposes of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 2253.

4. Upon conviction of any offense alleged in Counts One and Two of this Information, the defendant, **JUSTIN ROBERT FOLEY**, shall forfeit to the United States:

(a) all matter containing said visual depictions of child pornography and child erotica, transported, mailed, shipped and possessed in violation of 18 U.S.C. § 2251 and/or 18 U.S.C. § 2252; and

(b) all property used and intended to be used to commit and to promote the commission of the aforementioned violations, including but not limited to the following:

- One Western Digital Passport External Drive;
- One Toshiba Satellite Laptop, serial number 3E108691U;
- One HP 15-cs302od Laptop, serial number 5CD0296FTP;
- One Apple iPhone 7, serial number F18V3CDEHX98; and

- One Apple iPhone 11, serial number F4GF7ATHN72W.

**Forfeiture in accordance with 18 U.S.C. §§ 2253(a)(1) and (3), 28 U.S.C. 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.**

KENNETH L. PARKER  
United States Attorney

*s/Jennifer M. Rausch*  
*s/Emily Czerniejewski*

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